

**PORZIO, BROMBERG & NEWMAN, P.C.**

(Mail to) P.O. Box 1997, Morristown, NJ 07962-1997

(Delivery to) 100 Southgate Parkway, Morristown, NJ 07960

Telephone (973) 538-4006

Facsimile (973) 538-5146

-and-

156 West 56<sup>th</sup> Street

New York, NY 10019

Attorneys Appearing: John S. Mairo (JM-0670)  
Brett S. Moore (BM-0014)

Attorneys for Neuman Aluminum Automotive, Inc. and  
Neuman Aluminium Impact Extrusion, Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

	-----X	
	:	Chapter 11
In re:	:	
	:	Case No. 05-44481
DELPHI CORP., <i>et al.</i> ,	:	
	:	
Debtors.	:	October 13, 2005
	:	
	-----X	

**NOTICE OF DEMAND FOR RECLAMATION  
BY NEUMAN ALUMINUM AUTOMOTIVE, INC.  
AND NEUMAN ALUMINIUM IMPACT EXTRUSION, INC.**

PLEASE TAKE NOTICE that on October 13, 2005 pursuant to 11 U.S.C. § 546(c), Neuman Aluminum Automotive, Inc. and Neuman Aluminium Impact Extrusion, Inc. (collectively, "Neuman"), served its written demand for reclamation of goods upon Delphi Corporation and its affiliated debtors. A copy of the written demand for reclamation is attached hereto as Exhibit A.

Neuman demands return of the goods or protection of its claim as provided by 11 U.S.C. § 546(c) or otherwise applicable law.

Dated: October 13, 2005

NEUMAN ALUMINUM AUTOMOTIVE, INC.  
NEUMAN ALUMINIUM IMPACT  
EXTRUSION, INC.

By: /s/ John S. Mairo  
John S. Mairo (JM 0670)  
Brett S. Moore (BM 0114)

**PORZIO, BROMBERG & NEWMAN, P.C.**  
(Mail to) P.O. Box 1997, Morristown, NJ 07962-1997  
(Delivery to) 100 Southgate Parkway, Morristown, NJ 07960  
Telephone (973) 538-4006  
Facsimile (973) 538-5146  
-and-  
156 West 56<sup>th</sup> Street  
New York, NY 10019

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of October, 2005, a copy of the foregoing **Notice of Demand For Reclamation By Neuman Aluminum Automotive, Inc. and Neuman Aluminium Impact Extrusion, Inc.** was served by first class mail, postage prepaid, on the following:

John William Butler, Jr., Esq.  
Skadden, Arps, Slate, Meagher & Flom  
333 West Wacker Drive, Suite 2100  
Chicago, IL 60606-1285

Kayalyn A. Marafioti, Esq.  
Thomas J. Matz, Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP  
Four Times Square  
New York, NY 10036

Alicia M. Leonhard, Esq.  
Office of the United States Trustee  
33 Whitehall Street, Suite 2100  
New York, NY 10004

/s/ John S. Mairo  
John S. Mairo

## **EXHIBIT A**

FAX HEADER: PORZIO BROMBERG &amp; NEWMAN

TRANSMITTED/STORED : OCT. 13. 2005 5:34PM  
FILE MODE OPTION

FILE MODE	OPTION	ADDRESS	RESULT	PAGE
728	MEMORY TX	*60999948003913124070411	OK	7/7

REASON FOR ERROR OR LINE FAIL  
E-1) HANG UP OR  
E-3) NO ANSWERE-2) BUSY  
E-4) NO FACSIMILE CONNECTION**PORZIO**  
**BROMBERG & NEWMAN P.C.**  
**ATTORNEYS AT LAW****100 Southgate Parkway**  
**Morristown, New Jersey 07962-1997**  
**TEL: 973-538-4006 FAX: 973-538-5146****FROM:** John S. Mairo, Esq. **DATE:** October 13, 2005**Please send the annexed document to:****NAME:** John Wm. Butler, Jr., Esq.  
**COMPANY:** Skadden, Arps, Slate, Meagher & Flom LLP  
**CITY AND STATE:** Chicago, IL 60606  
**FAX NUMBER:** 312-407-0411  
**CLIENT-MATTER NAME:** Delphi Corp.  
**CLIENT-MATTER NUMBER:** Pending**RE:****TOTAL NUMBER OF PAGES, INCLUDING COVER SHEET:** 7**MESSAGE:****If you have any problems receiving this transmittal, please call (973) 538-4006, ext. 4002.****The Original Of This Document WILL BE Sent By Regular Mail**

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JMGastineau x4056

Pg 6 of 13

From: Origin ID: (973)538-4006  
 Jayne Gastineau  
 PORZIO, BROMBERG & NEWMAN, P.C  
 100 SOUTHGATE PARKWAY

MORRISTOWN, NJ 07960



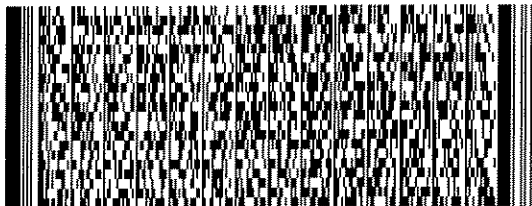
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SHIP TO: (973)538-4006

BILL SENDER

**Francoise Lewis**  
**Delphi**  
**3535 Kettering Boulevard**

**Morraine, OH 45439**



Ship Date: 13OCT05  
 ActWgt: 1 LB  
 System#: 3336758/INET2300  
 Account#: S \*\*\*\*\*

REF: 09999.48003 (Neuman)



Delivery Address Bar Code

PRIORITY OVERNIGHT

FRI

Deliver By:  
 14OCT05

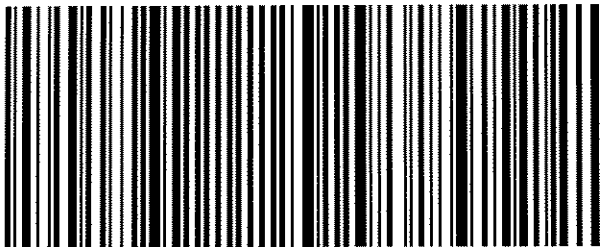
TRK# 7901 8678 0995

FORM  
0201

DAY A1

45439 -OH-US

NW MWOA



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Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

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Jayne Gastineau  
PORZIO, BROMBERG & NEWMAN, P.C  
100 SOUTHGATE PARKWAY

MORRISTOWN, NJ 07960



CL5092005/08/16

SHIP TO: (312)407-0700

BILL SENDER

**John Butler**  
**Skadden Arps**  
**333 West Wacker Drive**  
**Suite 2100**  
**Chicago, IL 60606**

Ship Date: 13OCT05  
ActWgt: 1 LB  
System#: 3336758/INET2300  
Account#: S \*\*\*\*\*

REF: 09999.48003 (Neuman)



Delivery Address Bar Code

**PRIORITY OVERNIGHT**

**FRI**

Deliver By:  
14OCT05

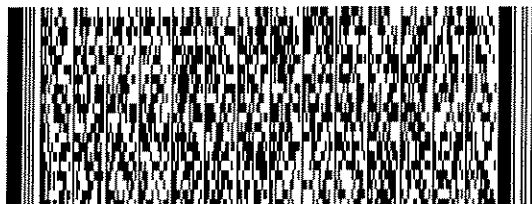
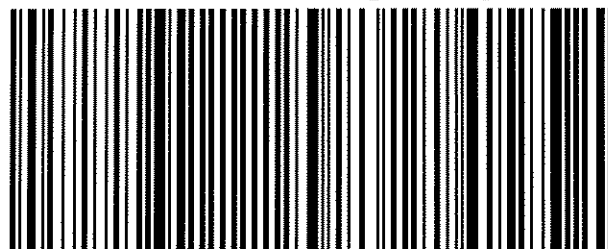
TRK# 7906 7801 0892

FORM  
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ATTORNEYS AT LAW

TELEPHONE (973) 538-4006 • FAX (973) 538-5146

JOHN S. MAIRO  
MEMBER, NJ AND NY BARS  
DIRECT DIAL NO.: 973-889-4107  
E-MAIL ADDRESS: JSMAIRO@PBNLAW.COM

October 13, 2005

**VIA FEDERAL EXPRESS**

Francoise Lewis  
Senior Commodity Manager  
Delphi  
3535 Kettering Boulevard  
Morraine, OH 45439

**VIA FACSIMILE (312.407.0411) AND  
ORIGINAL TO FOLLOW BY FEDERAL  
EXPRESS**

John Wm. Butler, Jr., Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP  
333 West Wacker Drive, Suite 2100  
Chicago, IL 60606

Re: *Delphi Corp.*  
*Case No. 05-44481 (RDD)*  
Our File No.: Pending

To the Above Addressed Recipients:

This firm represents Neuman Aluminum Automotive, Inc. and Neuman Aluminium Impact Extrusion, Inc. (collectively, "Neuman"), a supplier of impact extruded parts for accumulator dehydrators and receiver dryers. This letter serves as Neuman's written demand to reclaim the goods it sold on credit to, and which were received by, Delphi Corp. and/or its affiliates and subsidiaries (collectively, "Delphi"), in the ten (10) day period prior to Delphi's filing its Chapter 11 petition. Goods shipped and received but not yet paid for are identified in the invoice summary attached hereto.

Notwithstanding the attached detail, this demand covers any and all other goods Delphi received from Neuman on or after September 28, 2005 up until the time the bankruptcy petition was filed (the "Reclamation Period").

This demand is made pursuant to § 546(c) of the Bankruptcy Code and § 2-702 of the Uniform Commercial Code. Please see to it that none of these goods are sold, used, or otherwise disposed of before Neuman exercises its reclamation rights. Neuman demands that Delphi segregate from other inventory all goods subject to Neuman's reclamation and currently in Delphi's control. Neuman reserves all of its rights, claims, defenses and interests.

100 SOUTHGATE PARKWAY, P.O. BOX 1997  
MORRISTOWN, NJ 07962-1997  
NEW YORK CITY OFFICE: 212-265-6888  
BRICK NJ OFFICE: 732-262-9248  
www.pbnlaw.com



**PORZIO**  
BROMBERG & NEWMAN P.C.

Francoise Lewis  
John Wm. Burtler, Jr., Esq.  
October 13, 2005

Page 2

ATTORNEYS AT LAW

Should you have any questions regarding this matter, please do not hesitate to contact me at the above number.

Very truly yours,



John S. Mairo

JSM/jmg  
Enclosures

Customer ID	Part Number	Ship Date	Price	Full Qty	Extended
<b>EL PASO SHIPMENTS</b>					
DELPHI	6560846	09/01/2005	1.26	3600	\$4,536.00
		09/01/2005	1.26	3000	\$3,780.00
		09/02/2005	1.26	7200	\$9,072.00
		09/02/2005	1.26	6000	\$7,560.00
		09/06/2005	1.26	3600	\$4,536.00
		09/06/2005	1.26	2400	\$3,024.00
		09/07/2005	1.26	3600	\$4,536.00
		09/07/2005	1.26	1200	\$1,512.00
		09/08/2005	1.26	3600	\$4,536.00
		09/08/2005	1.26	2400	\$3,024.00
		09/09/2005	1.26	3600	\$4,536.00
		09/09/2005	1.26	3000	\$3,780.00
		09/12/2005	1.26	3600	\$4,536.00
		09/12/2005	1.26	3000	\$3,780.00
		09/13/2005	1.26	3600	\$4,536.00
		09/13/2005	1.26	2400	\$3,024.00
		09/14/2005	1.26	3600	\$4,536.00
		09/14/2005	1.26	2400	\$3,024.00
		09/15/2005	1.26	3600	\$4,536.00
		09/15/2005	1.26	3000	\$3,780.00
		09/19/2005	1.26	3600	\$4,536.00
		09/19/2005	1.26	1800	\$2,268.00
		09/20/2005	1.26	3600	\$4,536.00
		09/20/2005	1.26	2400	\$3,024.00
		09/21/2005	1.26	3000	\$3,780.00
		09/22/2005	1.26	3600	\$4,536.00
		09/22/2005	1.26	2400	\$3,024.00
		09/23/2005	1.26	14400	\$18,144.00
		09/23/2005	1.26	12000	\$15,120.00
		09/23/2005	1.26	13200	\$16,632.00
		09/23/2005	1.26	5400	\$6,804.00
		09/23/2005	1.26	5400	\$6,804.00
		09/23/2005	1.26	12000	\$15,120.00
		09/23/2005	1.26	14400	\$18,144.00
	6561503	09/19/2005	0.829	53	\$43.94
	6561505	09/01/2005	0.874	3260	\$2,849.24
		09/01/2005	0.874	815	\$712.31
		09/02/2005	0.874	7335	\$6,410.79
		09/02/2005	0.874	6520	\$5,698.48
		09/06/2005	0.874	815	\$712.31
		09/06/2005	0.874	1630	\$1,424.62
		09/07/2005	0.874	4075	\$3,561.55
		09/08/2005	0.874	4075	\$3,561.55
		09/08/2005	0.874	2445	\$2,136.93
		09/09/2005	0.874	4075	\$3,561.55
		09/09/2005	0.874	4075	\$3,561.55
		09/12/2005	0.874	4075	\$3,561.55
		09/13/2005	0.874	4075	\$3,561.55

	09/13/2005	0.874	1630	\$1,424.62
	09/14/2005	0.874	4075	\$3,561.55
	09/14/2005	0.874	815	\$712.31
	09/15/2005	0.874	4075	\$3,561.55
	09/15/2005	0.874	815	\$712.31
	09/19/2005	0.874	4075	\$3,561.55
	09/19/2005	0.874	1630	\$1,424.62
	09/20/2005	0.874	4075	\$3,561.55
	09/20/2005	0.874	1630	\$1,424.62
	09/21/2005	0.874	815	\$712.31
	09/22/2005	0.874	4075	\$3,561.55
	09/23/2005	0.874	11410	\$9,972.34
	09/23/2005	0.874	9780	\$8,547.72
	09/23/2005	0.874	11410	\$9,972.34
	09/23/2005	0.874	5705	\$4,986.17
	09/23/2005	0.874	6520	\$5,698.48
	09/23/2005	0.874	9780	\$8,547.72
	09/23/2005	0.874	11410	\$9,972.34
6561506	09/01/2005	1.001	2000	\$2,002.00
	09/01/2005	1.001	1200	\$1,201.20
	09/02/2005	1.001	3200	\$3,203.20
	09/02/2005	1.001	3200	\$3,203.20
	09/07/2005	1.001	1600	\$1,601.60
	09/07/2005	1.001	800	\$800.80
	09/08/2005	1.001	1600	\$1,601.60
	09/09/2005	1.001	800	\$800.80
	09/12/2005	1.001	1200	\$1,201.20
	09/12/2005	1.001	1600	\$1,601.60
	09/13/2005	1.001	1600	\$1,601.60
	09/13/2005	1.001	800	\$800.80
	09/14/2005	1.001	1600	\$1,601.60
	09/14/2005	1.001	800	\$800.80
	09/15/2005	1.001	1600	\$1,601.60
	09/15/2005	1.001	1600	\$1,601.60
	09/19/2005	1.001	1600	\$1,601.60
	09/20/2005	1.001	800	\$800.80
	09/20/2005	1.001	400	\$400.40
	09/21/2005	1.001	1200	\$1,201.20
	09/22/2005	1.001	1600	\$1,601.60
	09/22/2005	1.001	800	\$800.80
	09/23/2005	1.001	12000	\$12,012.00
	09/23/2005	1.001	12000	\$12,012.00
	09/23/2005	1.001	10400	\$10,410.40
	09/23/2005	1.001	11200	\$11,211.20
	09/23/2005	1.001	2800	\$2,802.80
	09/23/2005	1.001	2800	\$2,802.80
	09/23/2005	1.001	10400	\$10,410.40
6561507	09/23/2005	0.97	13000	\$12,610.00
6561508	09/23/2005	0.829	6600	\$5,471.40

				\$0.00
6561509	09/07/2005	1.31	600	\$786.00
	09/09/2005	1.31	600	\$786.00
	09/19/2005	1.31	600	\$786.00
	09/22/2005	1.31	600	\$786.00
	09/23/2005	1.31	2400	\$3,144.00
	09/23/2005	1.31	600	\$786.00
	09/23/2005	1.31	1200	\$1,572.00
	09/23/2005	1.31	2400	\$3,144.00
6561720	09/23/2005	1.794	3000	\$5,382.00
6561949	09/23/2005	1.458	1800	\$2,624.40
06561964	09/02/2005	1.71	1344	\$2,298.24
	09/02/2005	1.71	1344	\$2,298.24
	09/08/2005	1.71	1394	\$2,383.74
	09/12/2005	1.71	1344	\$2,298.24
	09/14/2005	1.71	828	\$1,415.88
06561965	09/02/2005	0.945	1260	\$1,190.70
	09/02/2005	0.945	1260	\$1,190.70
	09/08/2005	0.945	1260	\$1,190.70
	09/12/2005	0.945	1260	\$1,190.70
	09/13/2005	0.945	1260	\$1,190.70
	09/15/2005	0.945	1260	\$1,190.70
	09/20/2005	0.945	1260	\$1,190.70
	09/22/2005	0.945	1260	\$1,190.70
	09/23/2005	0.945	2520	\$2,381.40
	09/23/2005	0.945	1260	\$1,190.70
	09/23/2005	0.945	3780	\$3,572.10
06570605	09/21/2005	1.988	600	\$1,192.80
	09/23/2005	1.988	600	\$1,192.80
	09/23/2005	1.988	600	\$1,192.80
	09/23/2005	1.988	600	\$1,192.80
	09/23/2005	1.988	600	\$1,192.80
	09/23/2005	1.988	600	\$1,192.80
06570752	09/01/2005	1.505	600	\$903.00
	09/02/2005	1.505	1200	\$1,806.00
	09/02/2005	1.505	1200	\$1,806.00
	09/08/2005	1.505	600	\$903.00
	09/09/2005	1.505	600	\$903.00
	09/09/2005	1.505	600	\$903.00
	09/12/2005	1.505	600	\$903.00
	09/12/2005	1.505	1200	\$1,806.00
	09/13/2005	1.505	600	\$903.00
	09/13/2005	1.505	600	\$903.00
	09/14/2005	1.505	600	\$903.00
	09/14/2005	1.505	600	\$903.00
	09/15/2005	1.505	600	\$903.00

	09/19/2005	1.505	600	\$903.00
	09/20/2005	1.505	600	\$903.00
	09/20/2005	1.505	600	\$903.00
	09/21/2005	1.505	600	\$903.00
	09/22/2005	1.505	600	\$903.00
	09/23/2005	1.505	1800	\$2,709.00
	09/23/2005	1.505	1200	\$1,806.00
	09/23/2005	1.505	1200	\$1,806.00
	09/23/2005	1.505	2400	\$3,612.00
<b>TOTAL</b>				<b>\$526,517.51</b>

**WAYNESBORO SHIPMENTS**

6561964				
	9/17/2005	1.71	1344	\$2,298.24
	9/20/2005	1.71	1344	\$2,298.24
	9/22/2005	1.71	1344	\$2,298.24
	9/23/2005	1.71	1344	\$2,298.24
	9/26/2005	1.71	1344	\$2,298.24
	9/30/2005	1.71	2688	\$4,596.48
	10/6/2005	1.71	2688	\$4,596.48
	10/7/2005	1.71	1344	\$2,298.24
	10/10/2005	1.71	1344	\$2,298.24
6570752				\$0.00
	10/6/2005	1.505	1853	\$2,788.77
	10/7/2005	1.505	2400	\$3,612.00
	10/10/2005	1.505	1200	\$1,806.00
6560846				\$0.00
	10/6/2005	1.26	13853	\$17,454.78
	10/7/2005	1.26	13800	\$17,388.00
	10/10/2005	1.26	6000	\$7,560.00
6561503				\$0.00
	9/15/2005	0.829	2400	\$1,989.60
	9/22/2005	0.829	2400	\$1,989.60
	9/29/2005	0.829	2400	\$1,989.60
	10/6/2005	0.829	2400	\$1,989.60
	10/10/2005	0.829	600	\$497.40
6561504				\$0.00
	9/15/2005	0.829	1200	\$994.80
6561505				\$0.00
	10/8/2005	0.874	12600	\$11,012.40
	10/10/2005	0.874	6000	\$5,244.00
<b>TOTAL</b>				<b>\$101,597.19</b>
<b>GRAND TOTAL</b>				<b>\$628,114.69</b>